

EXHIBIT 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
Plaintiff,)
) Case No.
vs.) 3:17-cv-000939-WHA
)
UBER TECHNOLOGIES, INC.;)
OTTOMOTTO LLC; OTTO TRUCKING,)
INC.,)
)
Defendants.)
_____)

*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***

VIDEOTAPED DEPOSITION OF ZACHARY MORRISS
San Francisco, California
Wednesday, July 26, 2017
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
Job No. 2661294

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VIDEOTAPED DEPOSITION OF ZACHARY MORRISS,
Volume I, taken on behalf of Defendants, at 425
Market Street, San Francisco, California, beginning
at 9:07 a.m., and ending at 4:52 p.m., on Wednesday,
July 26, 2017, before CARLA SOARES, Certified
Shorthand Reporter No. 5908.

1 Trucking is? 16:24:46

2 A I'm not sure what the distinction is

3 between Otto Trucking and Ottomotto LLC and Otto and

4 all the other Ottobot-esque terms that are being

5 thrown around. 16:25:00

6 Q But you just have -- you don't really have

7 any knowledge of what Otto Trucking really is, just

8 to confirm?

9 A I don't know distinctly what it is from

10 those other entities. 16:25:09

11 Q During -- when Anthony Levandowski was

12 still at Google/Waymo, did you ever hear him talk

13 about trucking?

14 A Trucking in general?

15 Q In general. 16:25:22

16 A Yes.

17 Q What did he say?

18 A There was -- I'm not going to be able to

19 quote him verbatim, certainly, but there was one

20 laser stand-up that he -- the group meeting with the 16:25:32

21 whole laser team is what I meant by "stand-up" --

22 where he discussed with -- in front of his boss some

23 of the performance issues that he was having and

24 some of the frustrations with the company, and

25 then -- and the plan to solve that performance 16:25:51

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1 issue. 16:25:54

2 And he mentioned that if he couldn't get

3 to a solution, that he would go off and do something

4 else, possibly in a noncompete realm, like trucking.

5 Q Okay. And do you recall when this 16:26:07

6 conversation occurred, or this stand-up, I think you

7 called it?

8 A I think it was shortly before his

9 departure, on the order of magnitude of weeks, not

10 months. 16:26:18

11 Q Okay. And who was his boss at that time?

12 A Brian Salesky.

13 Q Brian Salesky. And do you know if -- do

14 you recall if Brian Salesky had a reaction to this

15 discussion? 16:26:28

16 A I wasn't particularly watching Brian

17 Salesky's face at this moment. Sorry.

18 Q Do you know whether there were any

19 discussions within Chauffeur about whether they

20 should pursue this trucking idea that Anthony 16:26:37

21 Levandowski presented?

22 MR. SCHMIDT: Objection to form.

23 THE WITNESS: I'm not sure that I'm privy

24 to any conversations that did or did not happen

25 around this at the higher levels. 16:26:54